

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

In re:

Case No.

Chapter

16-30731-KLP

Debtor(s)

Colleen Higgins

Plaintiff(s)

Adversary Proceeding No.

v.

QL Pearce

Defendant(s)

CERTIFICATION UNDER LOCAL BANKRUPTCY RULE 2090-1

Document Title:

Date Document Filed:

Docket Entry No.

modified. objection to certification of compliance.

I declare under penalty of perjury that (Check one box):

☒ No attorney has prepared or assisted in the preparation of this document.

☐ The following attorney prepared or assisted in the preparation of this document.

(Name of Attorney)

(Address of Attorney)

(Telephone Number of Attorney)

L Pearce

Name of Pro Se Party (Print or Type)

Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Signature of Pro Se Party

Executed on: 12 May 21 (Date)

Modified Objection to certification of compliance (discharge) filed by debtor and motion to dismiss

Virginia Eastern Bankruptcy court

701 east broad street

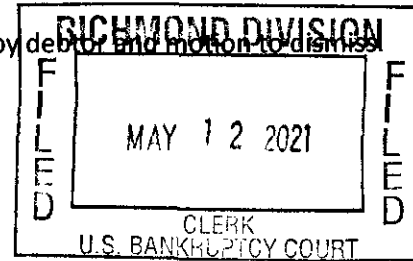
Eastern District VA

Richmond

VA 23219

Judge Keith Philips Room #5100 Case 16-30731-klp

"



This is an objection to debtors request re certification of compliance of bankruptcy and motion to dismiss.

I also want to raise up the fact that I was again not informed of this motion by the debtor, even though the last time I was not informed the judge stated that I was also to be informed by email.

Reasons for objection

1 The creditor objects to the debtor's statement that all payments have been made, as untrue. The creditors have not been paid out the required minimum 27% as required by the current plan. Also the debtor was meant to return the bond of \$5,216 to the trustee as extra money if it was returned to the debtor, per the judges verbal instructions in I think 2018.

2 The creditor objects to the debtors statement #6 as untrue.

"6. If applicable, I/we certify that as of the date of this certification that I/we have paid all amounts due under any domestic support obligation [as that term is defined in 11 U.S.C. §101(14A)] required by a judicial or administrative order, or by statute, including amounts due either (i) before this bankruptcy case was filed and provided for in the Plan, or (ii) due any time after the filing of this bankruptcy case."

The debtor is in arrears on child support medical payments due since November 2018 and there is pending litigation against the debtor in court at this time that the debtor is totally aware off as she has already asked for a continuance to the trial date.

3 The creditor objects to the debtors statement #4 as untrue.

"4. I/We did not have, either at the time of filing this bankruptcy or at the present time, equity in excess \$146,450 if the case was filed on or after April 1, 2010, in the type of property described in 11 U.S.C. §522(p)(1) [generally the debtor's homestead]. that the debtor does not have assets of more than \$146450 at the time of there filing."

I believe the debtor is again undervaluing the property and the assets of the debtor are more than the \$146,450 stated.

Regards


Laurie Pearce (Creditor)

23 Feb 2021

12 May 21



BANKRUPTCY COURT DROP BOX INFORMATION FORM

NOTICE:

- The Bankruptcy Court Clerk's Office intake counter is closed. The public may use the drop box to deposit filings and payments.
- Clerk's Office staff retrieve documents from the drop boxes at 9:00 a.m. each business day.

Date:	12 May
Case Name:	16 - 30731 - KLP
Case Number(s) (if applicable):	Higgins

Company/Firm:	
Name/Contact:	LAURIE PEARLE
Address:	2311 Thousand Oaks Dr
City, State, Zip:	Henrico VA 23294
Phone:	804 366 5609
Email Address:	LP23294@yahoo.com
CASHIER'S CHECK/MONEY ORDER ENCLOSED Yes _____ No <input checked="" type="checkbox"/>	
PERSONAL CHECKS FROM DEBTORS AND CASH NOT ACCEPTED	

- **IMPORTANT** - Please ensure the following:
 - ✓ Case caption and, if applicable, case number clearly identified on document(s).
 - ✓ Documents have been signed.
 - ✓ If a document is being filed by pro se litigant, please complete and sign the form titled: Certification Under Local Bankruptcy Rule 2090-1 and submit with your document.

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(Address of Attorney)

(Telephone Number of Attorney)

Name of Pro Se Party (Print or Type)

Name of Pro Se Party (Print or Type)

Signature of Pro Se Party

Signature of Pro Se Party

Executed on: _____ (Date)

FILED

2021 MAY 12 P 2:58

CLERK US DISTRICT COURT
RICHMOND, VIRGINIA